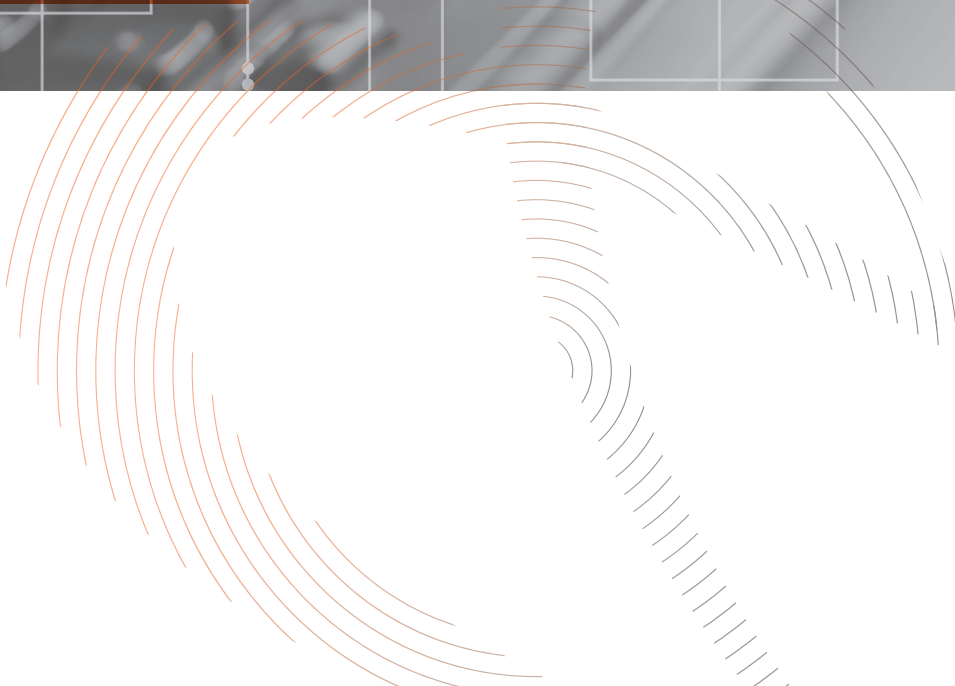


Data Privacy and Cyber Security Policy



Release date	3 April 2023
Prepared by	Puneet Chadha
Distribution	All Employees and Partners
Reviewed by	Ashley Menezes

Amendment Sheet

Sr. No.	Date	Revision Status	Reason for Amendment
1.	3 April 2023	Initial Release	NA

This policy aims to lay out the objectives, scope, and philosophy of ChrysCapital's Data Privacy and Cyber Security Policy (the "DPCS Policy").

ChrysCapital recognizes the importance of data privacy and cyber security in ensuring sustainable growth and business continuity across the organization. Information systems and data resources of ChrysCapital are critically important assets for its business operations.

ChrysCapital is committed to establishing and improving cyber security preparedness and minimizing its exposure to associated risks to safeguard their assets as well as the assets of the ultimate recipients of the Services. All the business functions of ChrysCapital implement adequate security policies, processes, and controls to protect confidentiality, maintain integrity, and ensure availability of all information assets.

I. Objective

The main objectives of this DPCS Policy are:

1. To define the data privacy and cyber security policy for ChrysCapital, which would include the information stored, processed and transmitted by ChrysCapital, as well as from the outsourced services;
2. To define a uniform approach, ensuring a high degree of data privacy and cyber security throughout ChrysCapital

II. Collection Of Personal Information

ChrysCapital may for purpose of rendering its services, collect Personal Information such as:

1. Name, gender, residential/correspondence address, telephone number, date of birth, marital status, email address or other contact information;
2. Identification documents, KYC status, signature and photograph;
3. Bank account or other payment instrument details;

4. Any other confidential information obtained for providing services

Personal information is collected directly from information providers when they apply for a service which ChrysCapital is obliged to do by law in force prior to providing with a service. On few occasions ChrysCapital may collect Personal Information from third parties, for example credit reporting agencies, share registries or regulatory authorities. Information that ChrysCapital collects will be limited to that required to provide their Services.

III. Use Of Personal Information

ChrysCapital may use Personal Information for the following purposes:

1. To provide the Services
2. To respond to inquiries and fulfil information requests
3. To complete relevant transactions
4. To send administrative information, such as changes to terms, conditions and policies
5. To send marketing-related emails, with information about the Services and other updates about ChrysCapital
6. To better understand users' interests and preferences, so that ChrysCapital can personalize the interactions and provide them with information tailored to their interests
7. For enhancing, improving, repairing, maintaining, or modifying ChrysCapital's current Services, as well as undertaking quality and safety assurance measures

IV. Sharing of the Personal Information

ChrysCapital may disclose the Personal Information:

1. To its affiliates and portfolio companies of the investment funds for the purposes described above
2. To its third-party service providers, to facilitate services they provide. These can include providers of services such as information technology and related infrastructure provision, email delivery, website hosting, market research, consulting, accounting, tax, legal, auditing, insurance, payment processing and other services
3. To comply with applicable laws and regulations, which may include laws outside the country of residence
4. To cooperate with public and government authorities, law enforcement agencies or any other legal reasons
5. In connection with a sale or business transaction

V. Cyber Security for Keeping the Personal Information Secure

ChrysCapital uses reasonable organizational, technical and administrative measures to protect Personal Information within the organization.

Given the scale of operations and team size at ChrysCapital, there are adequate informal, but process driven, IT policies in place to cover cybersecurity, data security, back-ups etc. IT services are outsourced

1. ChrysCapital uses Dropbox, Microsoft OneDrive, and local servers for backing up information
2. Dropbox covers 90% of ChrysCapital's database and has a well-defined data security policy
3. Microsoft Office 365 also has a two-way authentication security policy
4. Local servers have a well-defined security policy in place as well. Hence, no information can be accessed from outside the physical premises of the office, and there are safeguards in place to prevent access by unauthorized users.
5. A firewall is in place which helps monitor and control incoming and outgoing network traffic based on predetermined security rules.
6. ChrysCapital's IT security systems and policies are managed by a full-time (outsourced) IT professional.

VII. Updates To This Data Privacy and Cyber Security Policy

The content and robustness of implementation of this policy will be reviewed periodically and revised accordingly, as needed.

CHRYS CAPITAL

— ChrysCapital Advisors LLP

— 502 Ceejay House, Dr. Annie Besant Road,
Worli, Mumbai 400 018. INDIA.

— +91 22 4066 8000

— www.chryscapital.com

